



**United States Environmental Protection Agency**  
**Region I**  
**5 Post Office Square, Suite 100**  
**Boston, MA 02109-3912**

**URGENT MATTER -- PROMPT REPLY NECESSARY**  
**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

**FEB 16 2016**

Ms. Deborah K. Bartol, Business Development Associate  
Spraying Systems Company, East Coast Facility  
22 Flagstone Drive  
Hudson, NH 03051

**RE: NOTICE OF VIOLATION** of the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA), and the State of New Hampshire Revised Statutes Annotated (RSA), Chapter 147-A, and its implementing regulations, Env-Hw Parts 100-1114

Dear Ms. Bartol:

On April 29, 2015, representatives of the United States Environmental Protection Agency ("EPA") conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was to determine the compliance of Spraying Systems Company ("Spraying Systems"), EPA ID No. NH5986485068, with the State of New Hampshire regulations Env-Hw Parts 100-1114, and the federal Hazardous Waste Management Regulations found at 40 CFR Parts 260-272. The State of New Hampshire has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection noted above, EPA has determined that your facility violated certain provisions of Env-Hw 100-1114 and the RCRA regulations, promulgated at 40 CFR Parts 260 through 272. The violations are set forth below:

- 1. Failure to secure the less-than 90-day hazardous waste storage area ("HWSA");
- 2. Failure to electrically ground a 55-gallon metal satellite accumulation area (SAA) container of ignitable hazardous wastes;
- 3. Failure to post an emergency exit route at the HWSA;
- 4. Failure to properly label universal waste lamps and batteries;
- 5. Failure to properly date universal waste lamps and batteries;
- 6. Failure to store universal wastes for less than one year;
- 7. Failure to label used oil for recycling with the words "Used Oil for Recycling;"
- 8. Failure to adequately document HWSA and SAA inspection logs; and
- 9. Failure to conduct hazardous waste training.

**Immediately upon receipt of this NOTICE:**

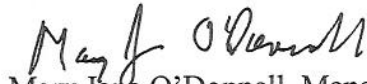
**Spraying Systems Company must address the requirements set forth above and must immediately begin and continue to operate in compliance with all applicable Federal and State regulations.**

**Within (30) thirty calendar days of receipt of this NOTICE**, submit a written description, with supporting documentation, of the actions taken to address items 1 through 9, above. Submit the information to:

Susann D. Nachmann, Environmental Engineer  
U.S. Environmental Protection Agency  
Office of Environmental Stewardship (OES05-4)  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109-3912

Failure to correct the violations as required by this NOTICE may subject the facility to further Federal enforcement action, including the assessment of penalties, pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928. If you have any questions regarding this NOTICE, please contact Susann D. Nachmann, of my staff, at (617) 918-1871.

Sincerely,



Mary Jane O'Donnell, Manager  
RCRA, EPCRA & Federal Programs Unit

cc: John Duclos, NHDES